

Lawrence P. Eagel, Esq. (LE-4505)
Jeffrey H. Squire (JS -8910)
Bragar Wexler & Eagel, P.C.
885 Third Avenue, Suite 3040
New York, NY 10022
(212) 308-5858
(212) 486-0462
Attorneys for Meredith Tranberg

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN GRAY, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS
ADMINISTRATIVE COMMITTEE OF CITIGROUP
INC., THE 401(k) INVESTMENT COMMITTEE, and
JOHN DOES 1 - 20,

Defendants.

Civil Action No: 07 Civ. 9790
(SHS) (DCF)

[ADDITIONAL CAPTIONS APPEAR FOLLOWING SIGNATURE BLOCKS]

PLAINTIFF MEREDITH TRANBERG'S RESPONSE TO THE *GRAY AND TADROS* PLAINTIFFS' MOTION FOR (1) CONSOLIDATION (2) APPOINTMENT OF LEAD PLAINTIFFS AND LEADERSHIP STRUCTURE AND (3) ENTRY OF [PROPOSED] PRETRIAL ORDER NO. 1

On November 14, 2007, Plaintiff Meredith Tranberg filed a complaint against Citigroup, Inc., and certain of its directors, officers, and employees, for violations of the Employee Retirement Income Security Act. *See Tranberg v. Citigroup, Inc., et al.*, No. 07-10341 (SHS). Plaintiff Tranberg supports the Motion of the *Gray and Tadros* Plaintiffs for consolidation, appointment of lead plaintiffs, and the appointment of Wolf Popper LLP and Harwood Feffer

LLP as co-lead counsel to prosecute the consolidated ERISA action, *see Gray v. Citigroup, Inc., et al.*, No. 07-cv-09790-SHS, Docket No. 3, filed on November 26, 2007.

Dated: December 11, 2007
New York, New York

Respectfully submitted,

By: /s Lawrence Eagel
Lawrence P. Eagel (LE-4505)
Jeffrey H. Squire (JS-8910)
Bragar, Wexler & Eagel, PC
885 Third Avenue, Suite 3040
New York, NY 10022
Tel: (212) 308-5858

Counsel for Plaintiff Meredith Tranberg

<p>SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10,</p> <p>Defendants.</p>	<p>Civil Action No: 07 Civ. 10294 (DC)</p>
<p>MEREDITH TRANBERG, individually and on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,</p> <p>Defendants.</p>	<p>Civil Action No: 07 Civ. 10341 (SHS)</p>
<p>ANTON RAPPOLD, individually and on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>CITIGROUP INC., CITIBANK, N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN and JANE DOES 1 - 10,</p> <p>Defendants.</p>	<p>Civil Action No: 07 Civ. 10396 (UA)</p>

SAMIER TADROS, on Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, ROBERT E. RUBIN, FRANKLIN A. THOMAS, JOHN DOES 1-20 (BEING CURRENT AND FORMER MEMBERS OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING CURRENT AND FORMER MEMBERS OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),

Defendants.

Civil Action No: 07 Civ. 10442 (UA)

STEPHAN FIORINO, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

Civil Action No: 07 Civ. 10458 (UA)

JAMES BOLLA, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

Civil Action No: 07 Civ. 10461
(UA)

MARK GEROULO, individually, on behalf of the CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K) PLAN FOR PUERTO RICO, and all others similarly,

Plaintiff,

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 401(k) PLAN INVESTMENT COMMITTEE and JOHN DOES 10-20, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ, ANN DIBBLE JORDAN, ANDREW N. LIVERIS, DUDLEY C. MECUM, ANNE M. MULCAHY, RICHARD D. PARSONS, ANDRALL E. PEARSON, CHARLES PRINCE, JUDITH RODIN, ROBERT E. RUBIN, FRANKLIN A. THOMAS, SANFORD I. WEILL,

Defendants.

Civil Action No: 07 Civ. 10472
(UA)

